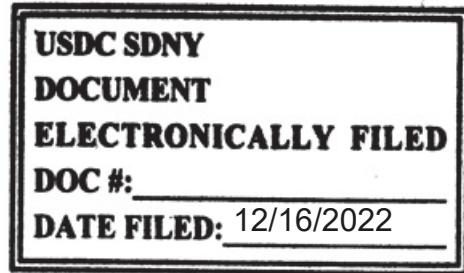


GIBSON DUNN

December 16, 2022



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Client: 13503-00001

**VIA ECF**

Hon. Robert W. Lehrburger  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street, Suite 1960  
New York, NY 10007

**Re: *Matter of Bulgari v. Bulgari, No. 1:22-cv-05072-LGS***

Dear Judge Lehrburger:

Defendant Veronica Bulgari requests an additional 7 days to file her response to Plaintiff's motion concerning certain evidentiary privileges with respect to Jan Boyer. This is Defendant's first request for an extension for the matter at issue.

Plaintiff's motion were served on Monday and our response is due next Monday, the 19th. The only senior associate at my firm working on this matter, Jennifer Bracht, underwent surgery in the last few days and has not been able to work until late yesterday. I have asked plaintiff's counsel to consent to this brief extension. They have replied that they do not object if we agree to certain deposition scheduling limitations. We may or may not ultimately agree to those limitations, but are not in a position to do so today, and do not believe it is appropriate to tie the two issues together.

Accordingly, we respectfully ask the Court to grant Defendant an additional 7 days to file her response. Because of the impending holidays, I have no objection to whatever extension of time beyond one week Plaintiff needs to submit her reply.

**GIBSON DUNN**

Hon. Robert W. Lehrburger  
United States Magistrate Judge  
December 16, 2022  
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Respectfully,

/s/ Mitchell A. Karlan  
Mitchell A. Karlan  
Jennifer K. Bracht

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cc: All counsel of record (via ECF)

Request granted. Response due Dec. 26, 2022.

SO ORDERED:

12/16/2022

  
HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE